

Kimberly Rose

July 4, 2006

Dear Sir or Madam:

I am writing this letter because I am extremely concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as an Arbonne Independent Consultant. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for me to sell Arbonne products and sponsor people into the business and grow my business.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. When I want to buy a car, no one tells me I have to wait 7 days before I can purchase a car. Furthermore, whose right is it to decide when I want to purchase something and if I can afford it? To start my arbonne business the costs are minimal. If I am forced to give someone a waiting period, I give the impression that there might be something wrong the Arbonne opportunity. If I were to start a franchise for considerably more money am I to wait 7 days? Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to my success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit my ability to grow my business and I would be unable to build momentum and excitement.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. I fear being penalized by the impression a lawsuit would leave, even if I have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. I am glad to provide references, but identity theft is a reality we live with in today's world and I am very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, I would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. I would find it an invasion of privacy to disclose personal data, for my business purposes.

I have been an Arbonne Independent Consultant for just 16 months. In that short period of time, this business has changed my life and over 1,000 people on my team. I started this

business as a way to help others achieve their dreams and in the process I have seen people believe in themselves while gaining financial security for themselves and their family. I have never worked for a company with such strong ethics and who has such an incredible moral foundation. I built a business with integrity, hard work and belief. I knew starting this business that network marketing was sometimes misunderstood but I also new that for many who work hard this is the best way to financial freedom. When people understand this business model they truly see it as a gift.

I truly appreciate the work of the FTC in protecting consumers, but I believe this proposed new rule would have many detrimental (and unintentional) consequences and I hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like me

Thank you for your time and understanding.

Sincerely,

Kimberly Rose